REMARKS

The Examiner rejected claim 1 as being obvious over Mitts in view of Jokimies. In response, Applicants have amended claim 1 to clarify the claimed invention. As amended, claim 1 and all of its dependent claims are patentably non-obvious over the cited references.

Claim 1 is directed to a cell re-selection method for mobile terminals engaged in a packet data session. Claim 1 requires, *inter alia*, a mobile terminal to read broadcast information on the control channels of one or more adjacent candidate cells prior to determining that a re-selection procedure is required, and during a packet data session. In reading the broadcast information for a cell, the mobile terminal of claim 1 <u>prospectively obtains two or more parameters that are required to establish a new packet data channel in that cell</u>. The two or more parameters are selected from the group consisting of system identification information, channel-specific access parameters, protocol parameters, neighbor list for that cell, the corresponding serving cell's coincidental DCCH pointers, and routing area identity. Upon performing a subsequent cell-reselection procedure, the mobile terminal uses the prospectively obtained parameters to establish a new packet data channel.

Amended claim 1 deviates from conventional re-selection techniques in that the mobile terminal of claim 1 prospectively obtains, and then later uses, the information necessary to establish a packet data channel in an adjacent cell. This permits the claimed mobile terminal to avoid the delays inherent with conventional re-selection techniques, in which mobile terminals obtain the information necessary to establish a new packet data channel only *after* initiating a cell re-selection procedure to an adjacent cell. Such conventional procedures are disclosed in both of the cited references.

The Examiner admits that Mitts fails to teach or suggest identifying one or more adjacent control channels as potential re-selection candidates, and reading broadcast information on a control channel of a cell identified as a potential re-selection candidate. Therefore, Mitts

necessarily fails to teach or suggest prospectively obtaining two or more parameters needed to establish a new packet data channel in an adjacent cell identified as a potential re-selection candidate. Jokimies also fails on this point.

Jokimies discloses a method of prioritizing the adjacent cells on a neighbor list for a re-selection process. More specifically, Jokimies calculates a parameter C2 for each cell in the list, and then uses that parameter to to place preferred cells higher on the neighbor list than non-preferred cells. *Jokimies*, p. 4, ¶[0060]. Then, on handoff, a mobile station in Jokimies selects the highest-priority cell from the list and initiates a re-selection procedure for that cell. *Jokimies*, p. 5, ¶¶[0068-0085].

Jokimies does not teach or suggest using *any* prospectively obtained parameters to establish a packet data channel on a selected cell, let alone two or more prospectively obtained parameters as claimed. Therefore, a mobile station in Jokimies performing cell-re-selection must obtain this information *after* initiating a cell-reselection procedure as is conventional. As such, mobile stations that operate according to Jokimies would experience the same types of delays that a mobile terminal operating according to the claimed invention avoids.

The Examiner asserts, however, that a mobile station in Jokimies may obtain system identification (SID) codes from signals transmitted by adjacent base stations. Assuming *arguendo* that this assertion is true, it still does not teach or suggest that Jokimies prospectively obtains two or more parameters that are required to establish a packet data channel in a cell prior to determining that cell-reselection is needed. Cell re-selection techniques require more information than just the SID to establish a packet data channel in a cell. Other data, such as channel specific access parameters, protocol parameters, and other non-SID information, are required to establish a packet data channel. Jokimies does not teach or suggest that a mobile station prospectively obtains any of these other parameters prior to determining that a cell re-selection procedure is needed. In short, even assuming *arguendo* that the Examiner is correct

regarding the SID, Jokimies teaches at most reading only a <u>single</u> parameter from the claimed group of parameters, not <u>two</u>. The claim expressly requires reading at least two. As such, Jokimies does not cure the deficiencies of the Mitts disclosure, and the combination of Mitts and Jokimies therefore fails to teach the "two or more" limitation of independent claim 1.

From the above, it is clear that neither reference teaches or suggests reading the broadcast information on the control channels to prospectively obtain two or more parameters that are required to establish a packet data channel in a cell as claimed. Nor do they teach or suggest actually using two or more prospectively obtained parameters to establish a packet data channel on a subsequent cell re-selection. And, because neither reference teaches or suggests these limitations alone, their combination necessarily fails to teach or suggest these limitations, and would fail to produce the claimed invention. As such, amended claim 1 and its dependent claims are patentably non-obvious over the cited art, alone and in combination.

The Examiner also rejected claim 7, which is directed to a cell re-selection method, over Mitts in view of Jokimies for reasons substantially similar to those stated above. Claim 7 has been amended, however, to now recite reading broadcast information on adjacent control channels during a communication session with a first cell to prospectively obtain one or more non-system identification information parameters required to establish a new traffic channel in each of the adjacent cells. Additionally, as in claim 1, a device (e.g., a mobile terminal) that prospectively obtains the one or more non-system identification parameters uses those parameters to establish a traffic channel in a corresponding cell in a subsequent re-selection procedure.

For reasons similar to those stated above, Mitts does not teach or suggest this limitation. Further, assuming *arguendo* that Jokimies does obtain a SID, Jokimies does not teach or suggest prospectively obtaining any parameters other than system identification (i.e., non-system identification parameters) prior to determining that a cell re-selection is needed, and
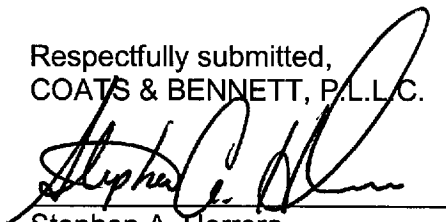
then later using those parameters to establish a traffic channel in a cell. Accordingly, neither

Mitts nor Jokimies teaches or suggests, alone or in combination, amended claim 7. Therefore,

claim 7 and all of its dependent claims are patentably non-obvious over the cited art.

The Examiner also rejected claim 14 over Mitts in view of Jokimies for reasons

substantially similar to those stated above. However, Applicant has cancelled claim 14 without

prejudice thereby making that rejection moot.

Finally, Applicants have amended claim 13 to correct a minor typographical error not

noted by the Examiner. None of the amendments add new matter.

In light of the foregoing remarks, Applicants respectfully request that the Examiner allow

all pending claims.

Respectfully submitted,
COATS & BENNETT, P.L.L.C.

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Stephen A. Herrera
Registration No.: 47,642
Telephone: (919) 854-1844
Facsimile: (919) 854-2084